

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

CHRISTINE FINGER §
Plaintiff §
v. §
UNITED AIRLINES, INC. §
Defendant §

Civil Action No. 4:20-cv-04205

PLAINTIFF'S INITIAL DISCLOSURES

Pursuant to Federal Rule of Civil Procedure 26, Plaintiff Christine Finger (“Plaintiff”) hereby serves the attached initial disclosures, which are based on current and presently available information and documents, after reasonable inquiry. Plaintiff reserves her right to supplement or amend these disclosures if further information, individuals, or documents are discovered. Plaintiff submits these disclosures without prejudicing her rights to introduce evidence of any subsequently discovered or unintentionally omitted facts or documents at or before trial.

Respectfully submitted,

/s/ H. Julian Frachtman
Hirsh Julian Frachtman
(TBN 24087356; SDTX No. 2695031)
Frachtman Law Office
Hfrachtmanlaw@gmail.com
3100 Richmond Ave., Ste 203
Houston, Texas 77098
Tel: (832) 499-0611
Fax: (713) 651-0819
ATTORNEY FOR PLAINTIFF

CERTIFICATE OF SERVICE

It is certified that on March 5th, 2024, the undersigned counsel served his *Plaintiff's Initial Disclosures* upon the following, via CM/ECF document filing system, email, and regular US mail, and has filed same with the Court through the CM/ECF system upon:

Amit K. Misra, Esq.,
MISRA LEGAL, P.C.
S.D. Tex. No. 21460
State Bar of Tex. No. 00795534
639 Heights Boulevard
Houston, Texas 77007
t: 832-723-4776
f: 832-476-9656
amit@misralegal.com
ATTORNEY FOR DEFENDANT

/s/ H. Julian Frachtman
Hirsh Julian Frachtman

PLAINTIFF'S INITIAL DISCLOSURES

RULE 26(a)(1)(A)(i)

The name and, if known, the address, and telephone number of each individual likely to have discoverable information – along with the subject of that information – that the disclosing party may use to support its claims or defenses, unless solely for impeachment:

Christine Finger

Plaintiff

c/o H. Julian Frachtman
Frachtman Law Office
3100 Richmond Avenue, Suite 203
Houston, Texas 77098
(832) 499-0611

Ms. Finger has first hand knowledge of her treatment and performance while employed by the Defendant, as well as the actions/omissions taken by the Defendant and their constituent managers, the Plaintiff's termination from employment with Defendant, and the facts surrounding that termination, and any alleged discrimination and retaliation.

Bob Krabbe

Employee / Manager of Defendant

[Current Employment Status: **unknown**]

tel: unknown

address: unknown

Bob Krabbe is believed to have first hand knowledge of Plaintiff's treatment and performance while employed by the Defendant, as well as the actions/omissions taken by the Defendant, the Plaintiff's termination from employment with Defendant, and the facts surrounding that termination, and any alleged discrimination and retaliation.

Aleta Stansberry

Employee / Manager of Defendant

[Current Employment Status: **unknown**]

tel: unknown

address: unknown

Aleta Stansberry is believed to have first hand knowledge of Plaintiff's treatment and performance while employed by the Defendant, as well as the actions/omissions taken by the Defendant, the Plaintiff's termination from employment with Defendant, and the facts surrounding that termination, and any alleged discrimination and retaliation.

Crystal Heckman

Employee / Manager of Defendant

[Current Employment Status: **unknown**]

tel: unknown

address: unknown

Crystal Heckman is believed to have first hand knowledge of Plaintiff's treatment and performance while employed by the Defendant, as well as the actions/omissions taken by the Defendant, the Plaintiff's termination from employment with Defendant, and the facts surrounding that termination, and any alleged discrimination and retaliation.

Sabrina Clark

Employee / Manager of Defendant

[Current Employment Status: **unknown**]

tel: unknown

address: unknown

Sabrina Clark is believed to have first hand knowledge of Plaintiff's treatment and performance while employed by the Defendant, as well as the actions/omissions taken by the Defendant, the Plaintiff's termination from employment with Defendant, and the facts surrounding that termination, and any alleged discrimination and retaliation.

Tammy Holt

Employee / Manager of Defendant

[Current Employment Status: **unknown**]

tel: unknown

address: unknown

Tammy Holt is believed to have first hand knowledge of Plaintiff's treatment and performance while employed by the Defendant, as well as the actions/omissions taken by the Defendant, the Plaintiff's termination from employment with Defendant, and the facts surrounding that termination, and any alleged discrimination and retaliation.

Elizabeth Hibbard

Employee / Manager of Defendant

[Current Employment Status: **unknown**]

tel: unknown

address: unknown

Elizabeth Hibbard is believed to have first hand knowledge of Plaintiff's treatment and performance while employed by the Defendant, as well as the actions/omissions taken by the Defendant, the Plaintiff's termination from employment with Defendant, and the facts surrounding that termination, and any alleged discrimination and retaliation.

Dominic Cordova

Employee / Manager of Defendant

[Current Employment Status: **unknown**]

tel: unknown

address: unknown

Dominic Cordova is believed to have first hand knowledge of Plaintiff's treatment and performance while employed by the Defendant, as well as the actions/omissions taken by the Defendant, the Plaintiff's termination from employment with Defendant, and the facts surrounding that termination, and any alleged discrimination and retaliation.

Enrique Velez

Employee / Manager of Defendant

[Current Employment Status: **unknown**]

tel: unknown

address: unknown

Enrique Velez is believed to have first hand knowledge of Plaintiff's treatment and performance while employed by the Defendant, as well as the actions/omissions taken by the Defendant, the Plaintiff's termination from employment with Defendant, and the facts surrounding that termination, and any alleged discrimination and retaliation.

Ken Diaz

Former Employee / Manager of Defendant

[Current Employment Status: **unknown**]

tel: unknown

address: unknown

Ken Diaz is believed to have first hand knowledge of Plaintiff's treatment and performance while employed by the Defendant, as well as the actions/omissions taken by the Defendant, the Plaintiff's termination from employment with Defendant, and the facts surrounding that termination, and any alleged discrimination and retaliation.

Maria Torre

Former Employee / Manager of Defendant

[Current Employment Status: **unknown**]

tel: unknown

address: unknown

Maria Torre is believed to have first hand knowledge of Plaintiff's treatment and performance while employed by the Defendant, as well as the actions/omissions taken by the Defendant, the Plaintiff's termination from employment with Defendant, and the facts surrounding that termination, and any alleged discrimination and retaliation.

Leslie Rios

Employee

[Current Employment Status: **unknown**]

tel: unknown

address: unknown

Ms. Rios is believed to have first hand knowledge of Plaintiff's treatment and performance while employed by the Defendant, as well as the actions/omissions taken by the Defendant, the Plaintiff's termination from employment with Defendant, and the facts surrounding that termination, and any alleged discrimination and retaliation.

Brenda Jordan

Employee

[Current Employment Status: **unknown**]

tel: unknown

address: unknown

Ms. Jordan is believed to have first hand knowledge of Plaintiff's treatment and performance while employed by the Defendant, as well as the actions/omissions taken by the Defendant, the Plaintiff's termination from employment with Defendant, and the facts surrounding that termination, and any alleged discrimination and retaliation.

Marcus Brown

In-House Counsel for Defendant

[Current Employment Status: **unknown**]

tel: unknown

address: unknown

Mr. Brown is believed to have first hand knowledge of Plaintiff's treatment and performance while employed by the Defendant, as well as the actions/omissions taken by the Defendant, the Plaintiff's termination from employment with Defendant, and the facts surrounding that termination, and any alleged discrimination and retaliation. This is based upon his inclusion in relevant emails regarding same.

Dorota Karpierz

In-House Counsel for Defendant

[Current Employment Status: **unknown**]

tel: unknown

address: unknown

Ms. Karpierz is believed to have first hand knowledge of Plaintiff's treatment and performance while employed by the Defendant, as well as the actions/omissions taken by the Defendant, the Plaintiff's termination from employment with Defendant, and the facts surrounding that termination, and any alleged discrimination and retaliation. This is based upon the fact that Ms. Karpierz executed the sworn Verifications for the Defendant's Answers to Interrogatories.

Denny Wheeling

Employee

[Current Employment Status: **unknown**]

tel: unknown

address: unknown

Mr. Wheeling is believed to have first hand knowledge of Plaintiff's treatment and performance while employed by the Defendant, as well as the actions/omissions taken by the Defendant, the Plaintiff's termination from employment with Defendant, and the facts surrounding that termination, and any alleged discrimination and retaliation.

Lucia Camacho

[Employee of the Reasonable Accommodation Program, United]

[Current Employment Status: **unknown**]

tel: unknown

address: unknown

Ms. Camacho is believed to have first hand knowledge of Plaintiff's treatment and performance while employed by the Defendant, as well as the actions/omissions taken by the Defendant, the Plaintiff's termination from employment with Defendant, and the facts surrounding that termination, and any alleged discrimination and retaliation.

Dee Wallace

[Employee of the Reasonable Accommodation Program, United]

[Current Employment Status: **unknown**]

tel: unknown

address: unknown

Ms. Wallace is believed to have first hand knowledge of Plaintiff's treatment and performance while employed by the Defendant, as well as the actions/omissions taken by the Defendant, the Plaintiff's termination from employment with Defendant, and the facts surrounding that termination, and any alleged discrimination and retaliation.

Karen Parker

[Employee of United - Worker's Compensation Dept.]

[Current Employment Status: **unknown**]

tel: unknown

address: unknown

Ms. Parker is believed to have first hand knowledge of Plaintiff's treatment and performance while employed by the Defendant, as well as the actions/omissions taken by the Defendant, the Plaintiff's termination from employment with Defendant, and the facts surrounding that termination, and any alleged discrimination and retaliation.

Jarret Beto

[Grievance Chairman of Association of Flight Attendants / Possible employee of United][
Current Employment Status: **unknown**]

tel: unknown

address: unknown

Mr. Beto is believed to have first hand knowledge of Plaintiff's treatment and performance while employed by the Defendant, as well as the actions/omissions taken by the Defendant, the Plaintiff's termination from employment with Defendant, and the facts surrounding that termination, and any alleged discrimination and retaliation.

Celeste Peterson

[Employee Association of Flight Attendants / Employee of United]
[Current Employment Status: **unknown**]

tel: unknown

address: unknown

Ms. Peterson is believed to have first hand knowledge of Plaintiff's treatment and performance while employed by the Defendant, as well as the actions/omissions taken by the Defendant, the Plaintiff's termination from employment with Defendant, and the facts surrounding that termination, and any alleged discrimination and retaliation.

Mark Kilayko

Managing Director / Employee of Defendant

[Current Employment Status: **unknown**]

tel: unknown

address: unknown

Mr. Kilayko is believed to have first hand knowledge of Plaintiff's treatment and performance while employed by the Defendant, as well as the actions/omissions taken by the Defendant, the Plaintiff's termination from employment with Defendant, and the facts surrounding that termination, and any alleged discrimination and retaliation.

Susan Cleverly

Employee of Defendant

[Current Employment Status: **unknown**]

tel: unknown

address: unknown

Ms. Cleverly is believed to have first hand knowledge of Plaintiff's treatment and performance while employed by the Defendant, as well as the actions/omissions taken by the Defendant, the Plaintiff's termination from employment with Defendant, and the facts surrounding that termination, and any alleged discrimination and retaliation. This includes the Plaintiff's flight exchange scheduling.

Carol Schultz

Employee of Defendant

[Current Employment Status: **unknown**]

tel: unknown

address: unknown

Ms. Schultz is believed to have first hand knowledge of Plaintiff's treatment and performance while employed by the Defendant, as well as the actions/omissions taken by the Defendant, the Plaintiff's termination from employment with Defendant, and the facts surrounding that termination, and any alleged discrimination and retaliation. This includes the Plaintiff's flight exchange scheduling.

Mary Merritt

Employee of Defendant

[Current Employment Status: **unknown**]

tel: unknown

address: unknown

Ms. Merritt is believed to have first hand knowledge of Plaintiff's treatment and performance while employed by the Defendant, as well as the actions/omissions taken by the Defendant, the Plaintiff's termination from employment with Defendant, and the facts surrounding that termination, and any alleged discrimination and retaliation. This includes the Plaintiff's flight exchange scheduling.

Diana Vail

Employee

[Current Employment Status: **unknown**]

tel: unknown

address: unknown

Ms. Vail is believed to be a fact witness regarding the Plaintiff's claims and causes of action.

Plaintiff reserves the right amend or supplement this list prior to the close of discovery.

RULE 26(a)(1)(A)(ii)

A copy – or description by category & location – of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment:

- Plaintiff's EEOC Charge of Discrimination
- Plaintiff's typed letter to Defendant
- Plaintiff's Statutory Notice of Right to Sue

The above are in the possession of the Law Offices of H. Julian Frachtman
3100 Richmond Avenue, suite 203, Houston, Texas 77098

Plaintiff reserves the right to amend or supplement this list prior to the close of discovery.

RULE 26(a)(1)(A)(iii)

A computation of any category of damages by the disclosing party – who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered;

Title VII of the Civil Rights Act of 1964, **42 U.S.C. § 2000e**, based upon Age;
Americans with Disabilities Act Amendments Act of 2008, **42 U.S.C. § 12101 et seq.**

- **Lost Wages / Back Pay / Front Pay / Punitives**, etc. employment benefits lost due to violation calculated from the date of termination, combined with the loss in trajectory of her vocation, and the derailing of her professional reputation;
- Prevailing interest on the above wages lost ;
- Final amount to be calculated at time of trial with the assistance of expert

Plaintiff reserves the right to amend or supplement this list prior to the close of discovery.

RULE 26(a)(1)(A)(iv)

For inspection and copying as under Rule 34, any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment in the action which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

N/A